

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

**161-10 HILLSIDE AUTO AVE, LLC d/b/a
HILLSIDE AUTO OUTLET, HILLSIDE AUTO
MALL INC d/b/a HILLSIDE AUTO MALL,
ISHAQUE THANWALLA, JORY BARON,
RONALD M BARON, and ANDRIS GUZMAN,**

Defendants.
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Case No.: 1:21-cv-7163 (OEM) (LB)

**DECLARATION OF
EMANUEL KATAEV, ESQ.
IN SUPPORT OF
DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

EMANUEL KATAEV, ESQ., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and I am a partner of Milman Labuda Law Group PLLC, attorneys for the Defendants in this case.
2. I respectfully submit this declaration in support of Defendants' motion for summary judgment (the "Motion"), and to supply this Court with exhibits relevant to its determination of the Motion consistent with this Court's Individual Practices & Rules.
3. Attached hereto as **Exhibit A** is a true and correct copy of entity information for defendant 161-10 Hillside Auto Ave, LLC d/b/a Hillside Auto Outlet from the New York State Department of State's Division of Corporations, a publicly available document.
4. Attached hereto as **Exhibit B** is a true and correct copy of Defendants' Supplemental Responses to Plaintiff's First Set of Interrogatories dated March 7, 2023.

5. Attached hereto as **Exhibit C** is a true and correct copy of entity information for Defendant Hillside Auto Mall Inc. d/b/a Hillside Auto Mall from the New York State Department of State's Division of Corporations, a publicly available document.

6. Attached hereto as **Exhibit D** is a true and correct copy of text messages between Plaintiff and others at Hillside Auto Outlet.

7. Attached hereto as **Exhibit E** is a true and correct copy of Plaintiff's complaint dated December 29, 2021.

8. Attached hereto as **Exhibit F** is a true and correct copy of Plaintiff's payroll records Bates stamped D1186-D1250.

9. Attached hereto as **Exhibit G** is a true and correct copy of Plaintiff's criminal record related to uttering forged instruments.

10. Attached hereto as **Exhibit H** is a true and correct copy of a transcript of the Deposition of Deanna Jennings, a corporate representative of 161-10 Hillside Auto Ave, LLC d/b/a Hillside Auto Outlet and Hillside Auto Mall Inc d/b/a Hillside Auto Mall, dated March 10, 2023.

11. Attached hereto as **Exhibit I** is a true and correct copy of the transcript of the Deposition of Ishaque Thanwalla, dated February 24, 2023.

12. Attached hereto as **Exhibit J** is a true and correct copy of the transcript of the Deposition of Andris Guzman, dated March 9, 2023.

13. Attached hereto as **Exhibit K** is a true and correct copy of the transcript of the Deposition of Leticia Francine Stidhum, dated February 17, 2023.

14. Attached hereto as **Exhibit L** is a true and correct copy of the transcript of the Deposition of Jory Baron, dated March 3, 2023.

15. Attached hereto as **Exhibit M** is a true and correct copy of the Declaration of Serge Zanaan dated October 10, 2022.

Dated: Lake Success, New York
December 1, 2023

/s/ Emanuel Kataev, Esq.
EMANUEL KATAEV, ESQ.